



CRUMILLER P.C.

February 13, 2023

*VIA ECF*

Hon. John G. Koeltl  
United States Courthouse  
Southern District of New York  
500 Pearl Street  
New York, New York 10007

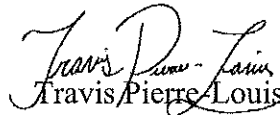
RE: *Samaka Ndege v. Skanska USA Building Inc.* – Case No. 22-CV-04420 (JGK)

Dear Judge Koeltl,

This Firm represents Plaintiff in the above-captioned employment discrimination matter. We write jointly with defense counsel in accordance with Your Honor's Individual Practices, 1(E), to request an extension of time for the deadline to file an electronic discovery protocol, from February 13, 2023, to March 15, 2023. This is the second time the Parties have requested an extension of this deadline. While both sides have been working towards a final agreement, there remains a number of disputes outstanding, and the Parties need additional time to resolve these issues and finalize the agreement.

We thank the Court in advance for its consideration of this letter motion.

Sincerely,

  
Travis Pierre-Louis

APPLICATION GRANTED  
SO ORDERED

  
John G. Koeltl, U.S.D.J.

2/13/23